

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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MARY PHILLIPA SLEDGE, MARY  
JANE PIDGEON SLEDGE TRUST, and  
PIDGEON SLEDGE FAMILY LIMITED  
PARTNERSHIP,

Plaintiffs,

v.

Case No. 2:13-cv-2578-STA-cgc

INDICO SYSTEM RESOURCES, INC. and  
CLEAL WATTS, III,

Defendants.

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**PLAINTIFFS' MOTION FOR INJUNCTIVE RELIEF, INCLUDING  
ASSET FREEZE, ACCOUNTING AND REPATRIATION OF ASSETS**

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Plaintiffs Mary Phillipa Sledge, Mary Jane Pidgeon Sledge Trust, and Pidgeon Sledge Family Limited Partnership ("Plaintiffs") respectfully move this Court for an injunction freezing the assets of Defendants Cleal Watts, III ("Watts") and Indico System Resources, Inc. ("Indico" or "ISR") (together "Defendants"), requiring Defendants to provide an accounting of the current location of Plaintiffs' funds and any other assets of Defendants, and to repatriate and transfer foreign assets and other assets subject to Defendants' control, which could be available to satisfy a judgment entered in favor of Plaintiffs. In further support of this Motion, Plaintiffs have filed their Memorandum of Law contemporaneously herewith.

Respectfully Submitted,

/s/ Darrell N. Phillips  
PIETRANGELO COOK PLC  
Anthony C. Pietrangelo BPR # 15596

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**Attorneys for Plaintiffs**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 22nd day of January 2015, a copy of the foregoing electronically submitted document was served on the parties listed below via first class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party.

Cleal Watts, III  
8926 Forest Hills Blvd.  
Dallas, TX 75218

Indico Systems Resources, Inc.  
8926 Forest Hills Blvd.  
Dallas, TX 75218

/s/ Darrell N. Phillips

**CERTIFICATE OF CONSULTATION**

The undersigned hereby certifies that on Friday, January 22, 2016, prior to filing this motion, he attempted to consult with Cleal Watts, the individual named Defendant and the authorized agent for the corporate Defendant and that Watts was completely unresponsive.

/s/ Darrell N. Phillips